



TOWN OF NEW SHOREHAM
TOWN COUNCIL

TELEPHONE (401) 466-3200
FAX (401) 466-3219
TTY 711

July 8, 2020

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: Request to Reinstate Eligible Locations Removed in Error

The Town of New Shoreham, RI (Block Island) is new to the FCC Auction process, but not new to broadband. In March 2019, the Town implemented the first municipal broadband network in Rhode Island, serving our community anchor institutions. The design for this network, serving both subsidized and non-subsidized entities, was socialized with the FCC prior to its implementation. This network leverages subsea fiber strands leased from National Grid, connecting the island network to mainland RI. The Town is currently poised to bring broadband internet to the entire residential and business community, and much like other coastal communities facing reduced tourism due to COVID-19, we are struggling to fund this project.

We greatly appreciate the serious and concerted efforts of the FCC to create opportunities for rural and geographically remote areas to obtain true broadband services, and open up the possible solutions to entities other than the major carriers. The Town of New Shoreham is one example of a municipality that has been failed by the major carriers. As the FCC maps have consistently shown, Verizon ADSL at maximum .768 upload and .128 download speeds has been the only fixed broadband service available to residents and most businesses and government entities. For higher end municipal and business users requiring greater speeds and lower latency, the only option was Verizon T1 circuits. These are available in selected areas of the island only, provide a maximum of 1.5Mbps to 6Mbps, and still do not meet the FCC's internet service standard. And satellite services have proven to be less than adequate for most island users due to high latency and cost.

The Town has been closely following the FCC in finalizing its rules and eligible areas for the Rural Digital Opportunity Fund (Auction 904) process, and plans to participate by either filing a short form application as member of a consortium with its broadband network implementation team partners or supporting those partners in their filing. When the Auction 904 Updated Eligible Areas maps were released on June 25th, we discovered that 250 of the initial 1,726 locations were no longer considered eligible. Upon reaching out to Katie King, FCC contact for the Updated Eligible Areas, we learned that Cox Communications had filed a challenge to two

census blocks within one of the two census block groups on Block Island, and that the locations in those areas were removed.

Although we understand the likely reasoning behind their challenge, Cox Communications has never and does not currently provide any (residential, business or government) fixed broadband service on Block Island. They have no telecommunications infrastructure on the island and offer no services to island residents or businesses.

The two census blocks within which Cox claims to provide service are 440090415001021 and 440090415001065. On the FCC map, the Block Island School is just outside Census block 440090415001065 and the Block Island Free Library is within Census block 440090415001021. (Attachment 1 provides maps of the Initial and Updated Eligible Areas on Block Island for Census Block Group 440090415001, as well as the two Census Blocks in question.) Prior to March 2019, the School and Library were provided transport service under a RI Department of Education (RIDE) statewide contract. As the winning bidder, Cox leased 2 sets of 3 bonded Verizon T1 circuits to provide transport services to the School and Library, with a maximum available speed to each of 4.5Mbps.

Since March 2019, the Block Island School and Block Island Free Library have received both transport and internet services via OSHEAN using the Town's CAI fiber broadband network.

We respectfully request that the FCC review our circumstances and consider reinstating the two census blocks and 250 locations removed as the result of erroneous information provided by Cox Communications. The 15% reduction in the aggregate reserve price for Block Island represents a significant impact to our financial models and the loss of possible annual support associated with these locations may jeopardize our community's ability to move forward with this critical project.

Sincerely,

A handwritten signature in black ink, reading "Kenneth C. Lacoste". The signature is fluid and cursive, with the first name "Kenneth" and last name "Lacoste" clearly legible.

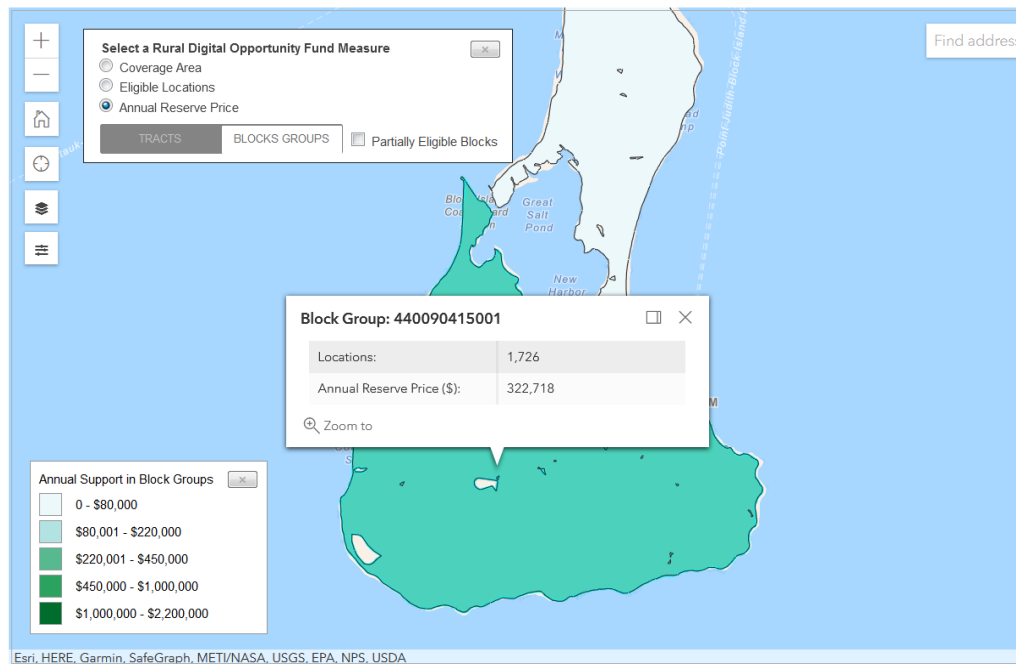
Kenneth C. Lacoste, First Warden
New Shoreham Town Council

Email: klacoste@new-shoreham.com

Attachment 1.

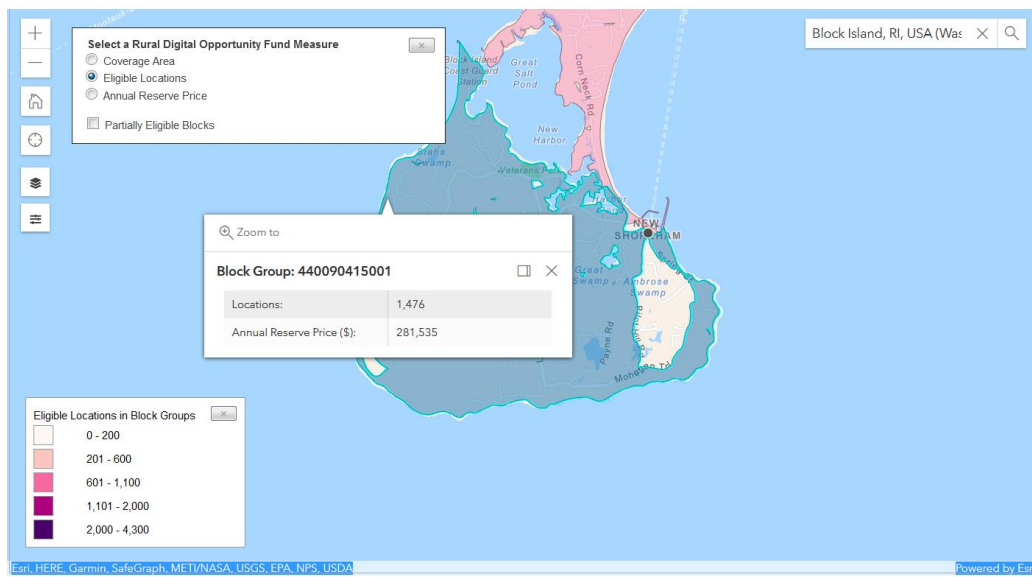
Auction 904 Initial Eligible Areas

Published on 3/17/20

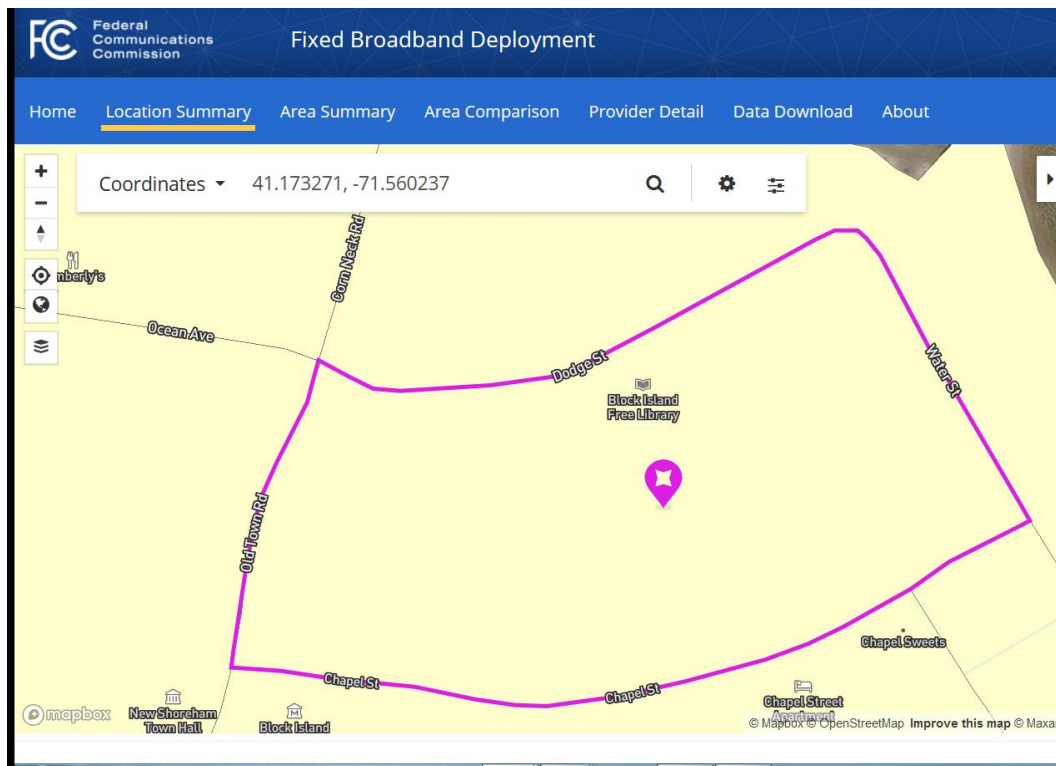


Auction 904 Updated Eligible Areas

Published on 06/25/20



FCC Map Outline of Census block 440090415001021.



FCC map partial outline of Census Block 440090415001065, depicting map location of Block Island School just outside this outline.

